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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE BED BATH & BEYOND  
STOCKHOLDER DERIVATIVE  
LITIGATION

Master File No. 2:20-cv-08673-MCA-MAH

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE**

WHEREAS, starting on July 10, 2020, three related shareholder derivative actions were filed in this Court on behalf of nominal defendant Bed Bath & Beyond Inc. (“BBBY”); and

WHEREAS, on October 14, 2020, the Court entered an order [ECF No. 12] consolidating the three cases under the caption shown above; and

WHEREAS, on August 3 and 4, 2021, the parties participated in a mediation to try to resolve the matter, but did not succeed in doing so at that time; and

WHEREAS, on January 4, 2022, Defendants and BBBY moved to dismiss the consolidated action [ECF No. 27]; and

WHEREAS, the parties have entered into a settlement in principle of the instant action and are in the process of documenting the settlement agreement in writing, and

WHEREAS, on March 31, 2022, the Court granted the parties' request to extend the deadline for Plaintiffs' response to the motion to dismiss to April 14, 2022 [ECF No. 31]; and

WHEREAS, the parties are continuing to work on settlement documentation and desire an adjournment of Plaintiffs' time to respond to the motion to dismiss to allow the parties to attempt to finalize the settlement documentation;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, Defendants, and Nominal Defendant BBY that:

1. Plaintiffs' time to respond to the Defendants' Motion to Dismiss is hereby adjourned from April 14, 2022 to May 18, 2022.

Dated: April 13, 2022

/s/ Laurence M. Rosen

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*Attorneys for Defendants and Nominal  
Defendant Bed Bath & Beyond Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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United States District Judge